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Attorneys for Trans Union LLC
(Erroneously sued as TRANSUNION)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

MOHAMED ABOUELHASSAN,

Plaintiff,

vs.

CHASE BANK, EXPERIAN,
EQUIFAX CREDIT INFORMATION
SERVICES, Inc, TRANSUNION, DOE
1, aka "B-Line", inclusive,

Defendants.

Case No. 5:07-cv-03951-JF

[Assigned to The Hon. Jeremy Fogel]

Complaint Filed: June 27, 2007

**REQUEST BY DEFENDANT
TRANS UNION LLC FOR LEAVE
TO ALLOW OUT OF STATE
CLIENT REPRESENTATIVE TO
ATTEND SETTLEMENT
CONFERENCE BY TELEPHONE;
DECLARATION OF DONALD E.
BRADLEY**

Date: January 28, 2008
Time: 2:00 p.m.
Crtrm.: 3

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant Trans Union LLC ("Trans Union") hereby respectfully requests that its client representative, located in Chicago, Illinois, be allowed to attend the January 28, 2008 Settlement Conference in this matter by telephone. This request is made on the ground that Trans Union's client representative is located in Chicago, Illinois, and requiring the representative to incur the cost of travel from Illinois would be unduly burdensome. Trans Union's lead trial counsel, Donald E. Bradley, will attend the Settlement Conference in person, and will, if this

1 request is granted, ensure smooth telephonic participation by Trans Union's client representative.

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3 DATED: January 16, 2008

Respectfully submitted,

4 MUSICK, PEELER & GARRETT LLP

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6 By: /s/ Donald E. Bradley

Donald E. Bradley

7 Attorneys for Trans Union LLC

8 (Erroneously sued as TRANSUNION)

DECLARATION OF DONALD E. BRADLEY

I, DONALD E. BRADLEY, declare:

1. I am an attorney licensed to practice in the State of California, and in the United States District Court, Northern District of California.. I am a partner in Musick, Peeler & Garrett LLP, located at 650 Town Center Drive, Suite 1200, Costa Mesa, California 92626, counsel of record for Defendant Trans Union LLC.

2. I am lead trial counsel for Defendant Trans Union LLC in this case. I have personal knowledge of the facts stated herein.

3. Trans Union is headquartered in Chicago, Illinois, and its client representative would therefore be required to travel to San Jose, California, at significant expense.

4. I have participated in many settlement conferences in the Northern District in similar cases in which Trans Union's client representative has participated telephonically, and those settlement conferences have run very smoothly and have very frequently led to settlements. In fact, the expense Trans Union can save in not having to travel from Chicago can be brought to bear in settlement negotiations.

5. If the Court grants Trans Union leave to attend telephonically, I will take all necessary steps to ensure smooth telephonic participation by Trans Union's client representative.

I declare under penalty of perjury under the laws of the United States of America and of the State of California that the foregoing is true and correct, and that this declaration was executed on this 16th day of January, 2008, at Costa Mesa, California.

/s/ Donald E. Bradley
Donald E. Bradley

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA
COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within entitled action; my business address is 650 Town Center Drive, Suite 1200, Costa Mesa, California 92626-1925.

On January 16, 2008, I served the foregoing document(s) described as **REQUEST BY DEFENDANT TRANS UNION LLC FOR LEAVE TO ALLOW OUT OF STATE CLIENT REPRESENTATIVE TO ATTEND SETTLEMENT CONFERENCE BY TELEPHONE; DECLARATION OF DONALD E. BRADLEY** on the interested parties in this action as follows:

See Attached List

☐ **BY PERSONAL DELIVERY.** I delivered such envelope by hand to the offices of the addressee.

☐ **BY MAIL.** I caused such envelope with postage thereon fully prepaid to be placed in the U.S. Mail at Costa Mesa, California. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Costa Mesa, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ **BY FACSIMILE TRANSMISSION.** I caused such document to be transmitted to the addressee(s) facsimile number(s) noted herein. I caused the machine to print a transmission record of the transmission. No errors were reported.

☐ **BY FEDERAL EXPRESS.** I caused such envelope to be deposited at the Federal Express office at Costa Mesa, California for guaranteed one/two day delivery with delivery charges prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for delivery by Federal Express delivery service. Under that practice, it would be deposited with the delivery service on that same day with delivery charges thereon fully prepaid at Costa Mesa, California in the ordinary course of business for delivery to the addressee.

☒ **BY ECF.** I caused such documents to be e-filed with the Court which were then served via the ECF filing system.

Executed on January 16, 2008, at Costa Mesa, California.

☒ **(Federal)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Karen S. Reisner
Karen S. Reisner

SERVICE LIST

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